

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

KEITH YAEGER, MICHAEL SCHULER, JOSEPH MONTGOMERY, BRYAN BAIR, THOMAS VANLAARHOVEN, LAURA HEGLE, KIM MARIE PAPA, ROBERT TEDESCO, and NATALIE TUZOVSAYA, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

SUBARU OF AMERICA, INC., a New Jersey Corporation, and FUJI HEAVY INDUSTRIES, LTD., a Japanese Corporation,

Defendants.

No. 1:14-cv-4490-JBS-KMW

**CLASS ACTION**

**DOCUMENT ELECTRONICALLY FILED**

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION  
FOR ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS**

**PLEASE TAKE NOTICE** that at the Final Fairness Hearing scheduled for 10:00 a.m. on July 26, 2016, Plaintiffs will move to have the Court enter the proposed order submitted herewith that will grant their unopposed motion seeking (1) the payment of \$1,500,000 to Plaintiffs' Counsel for the payment of their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards in the amount of \$3,500 each for Plaintiffs Keith Yaeger, Michael Schuler,

Joseph Montgomery, Bryan Bair, Thomas Vanlaarhoven, Laura Hegle, Kim Marie Papa, Robert Tedesco, and Natalie Tuzovskaya (\$31,500 total).<sup>1</sup>

**PLEASE FURTHER NOTE** that Plaintiffs will rely on the Memorandum of Law, Declarations of Counsel and other related materials in support of this motion.

**PLEASE FURTHER NOTE** that Defendants do not oppose this motion.

Dated: May 27, 2016

Respectfully submitted,

By: //s// Matthew D. Schelkopf  
Joseph G. Sauder  
Matthew D. Schelkopf  
Joseph B. Kenney  
**McCuneWright LLP**  
1055 Westlakes Drive  
Suite 300  
Berwyn, PA 19312  
Telephone: (909) 557-1250  
Email: [jgs@mccunewright.com](mailto:jgs@mccunewright.com)  
[mds@mccunewright.com](mailto:mds@mccunewright.com)  
[jbk@mccunewright.com](mailto:jbk@mccunewright.com)

Benjamin F. Johns  
**CHIMICLES & TIKELLIS LLP**  
One Haverford Centre  
361 West Lancaster Avenue  
Haverford, PA 19041  
Telephone: (610) 642-8500

---

<sup>1</sup> Plaintiffs will also request that the Court enter an order granting final approval to the settlement and dismissing this action with prejudice. A motion seeking that relief will be filed separately.

E-mail: [BFJ@chimicles.com](mailto:BFJ@chimicles.com)

Eric Gibbs  
**Girard Gibbs LLP**  
601 California St #1400  
San Francisco, CA 94108  
Telephone: (415) 981-4800  
E-mail: [ehg@classlawgroup.com](mailto:ehg@classlawgroup.com)

*Attorneys for Plaintiffs  
and the Settlement Class*

**CERTIFICATE OF SERVICE**

I, Matthew D. Schelkopf, hereby certify that the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS** was filed on this 27th day of May, 2016 using the Court's CM/ECF system, thereby electronically serving it on all counsel of record in this case.

*/s/ Matthew D. Schelkopf*  
Matthew D. Schelkopf